

LAW OFFICES OF BRONZE & TANG

A Professional Corporation

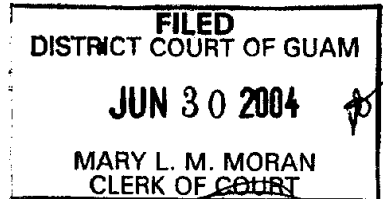
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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**HSBC's NOTICE OF *EX PARTE*
APPLICATION AND *EX PARTE*
APPLICATION FOR LETTERS OF
REQUEST FOR TAKING THE
DEPOSITION AND PRODUCTION
OF DOCUMENTS OF HARESH
MUKHI IN THE UNITED ARAB
EMIRATES**

TO: Plaintiffs, and their attorneys of record, ARRIOLA, COWAN & ARRIOLA

NOTICE IS HEREBY GIVEN that on _____, 2004, at the hour of _____m., Defendant Hongkong and Shanghai Banking Corporation, Limited ("HSBC"), will bring the following *Ex Parte* Application before the Court.

Concurrently with this *Ex Parte* Application, HSBC has filed an *Ex Parte* Motion for Letters of Request for Taking the Deposition and Production of Documents of Hareesh Mukhi in the United Arab Emirates.

This *Ex Parte* Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in Support of said Motion, and the documents on file herein all being incorporated herein by this reference. This *Ex Parte* Application is further supported by the Declaration of Jacques G. Bronze concurrently filed herewith.

DATED this 30th day of June 2004.

LAW OFFICES OF BRONZE & TANG
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By: _____


JACQUES G. BRONZE

*Attorneys for Defendant The Hongkong and
Shanghai Banking Corporation, Ltd.*